

Mr. James J. Murphy
Majestic Products Company
1000 East Market Street
Huntington, IN 46750-2579

Re: 069-11099-00013
First Minor Permit Modification to
Part 70 No.: T 069-7429-00013

Dear Mr. Murphy:

The Majestic Products Company was issued a permit on September 25, 1998, for a sheet metal work operation for fabricating fireplaces. A letter requesting changes to this permit was received on June 29, 1999. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Item (a) of Condition D.1.8 on Page 27 of the permit shall be modified as follows (bold emphasis added to new language):

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 ~~and D.1.3~~, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(3)** below. Records maintained for ~~(6)~~**(3)** shall be taken monthly except (3) which shall be kept daily. These records shall be complete and sufficient to establish compliance with the VOC ~~usage~~ **content** limits ~~and/or the VOC emission limits~~ established in Conditions D.1.1 ~~and D.1.3~~.

- (1) The amount and VOC content of each coating material and solvent used **in surface coating booth #008**. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use; and
- (3) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used **in surface coating booth #008**, compliance shall be based on the volume weighted average VOC content of the coatings used each day. The volume weighted average VOC content of the coatings shall be determined using the following equation:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\sum \text{coatings } [D^*O^*Q/(1-W^*Dc/Dw)]}{3 \text{ C}}$$

Dc = density of coating, lb/gal
Dw = density of water, lb/gal
O = weight percent organics, %
Q = quantity of coating, gal/unit
W = percent volume water, %
C = total of coatings used, gal/unit

~~(4) The cleanup solvent usage for each month;~~

~~(5) The total VOC usage for each month; and~~

~~(6) The weight of VOCs emitted for each compliance period.~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the attached revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janusz Johnson, OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for extension (2-8325), or dial (317) 232-8325.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachment

JKJ

cc: File - Huntington County
U.S. EPA, Region V
Huntington County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Majestic Products Company
1000 East Market Street
Huntington, Indiana 46750-2579**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T069-7429-00013	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 25, 1998
First Minor Permit Modification: 069-11099	Page Affected: 27
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (3) shall be taken monthly except (3) which shall be kept daily. These records shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used in surface coating booth #008. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use; and
- (3) If a coating having a VOC content greater than the amounts specified in Condition D.1.1 is used in surface coating booth #008, compliance shall be based on the volume weighted average VOC content of the coatings used each day. The volume weighted average VOC content of the coatings shall be determined using the following equation:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{\sum \text{coatings } [D \cdot O \cdot Q / (1 - W \cdot D_c / D_w)]}{\sum C}$$

D_c = density of coating, lb/gal
D_w = density of water, lb/gal
O = weight percent organics, %
Q = quantity of coating, gal/unit
W = percent volume water, %
C = total of coatings used, gal/unit

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Majestic Products Company
Source Location:	1000 East Market Street, Huntington, IN 46750-2579
County:	Huntington
SIC Code:	3444
Operation Permit No.:	T069-7429-00013
Operation Permit Issuance Date:	September 25, 1998
Permit Modification No.:	069-11099-00013
Permit Reviewer:	Janusz Johnson

The Office of Air Management (OAM) has reviewed a modification application from Majestic Products Company relating to the source's fireplace fabricating operation.

History

On September 25, 1998, Majestic Products Company was issued a Part 70 permit which included seven (7) surface coating booths (#001 through #006, and #008). On June 29, 1998, Majestic Products Company submitted a request to modify the recordkeeping requirements specified in Condition D.1.8 on Page 27 of the permit. Specifically, Majestic Products Company requested that the requirement to keep monthly records of volatile organic compound (VOC) usage and emissions be removed from the permit because there is no underlying VOC usage limit in the permit.

Review of the operation conditions in Section D.1 of the permit indicates that the only operation condition necessitating recordkeeping for volatile organic compounds (VOC) is Condition D.1.1 (Volatile Organic Compounds). This condition states that 326 IAC 8-2-9 (Miscellaneous Metal Coating) applies to the #008 spray coating booth only. The rule limits the volatile organic compound (VOC) content of coating delivered to the applicator of booth #008 to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. The method of demonstrating compliance with this rule is specified in Condition D.1.2 of the permit and requires records of the amount and VOC content of coating materials and thinning solvents used in the #008 booth and the dates of use. Compliance with Condition D.1.1 does not require the source to keep records of cleanup solvent usages, total VOC usages, or weights of VOCs emitted for booth #008 or any of the other spray booths covered by Section D.1. Therefore, Condition D.1.8, Item (a), shall be modified to correct the recordkeeping requirements to be consistent with the applicable requirements in Section D.1.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 29, 1999.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(b)(1)(B) because it involves changes to existing monitoring, reporting, or record keeping requirements which are not significant changes.

Conclusion

The operation of the paint booths in this fireplace fabricating operation shall be subject to the conditions of the attached proposed **Minor Permit Modification No. 069-11099-00013**.